

**Exhibit 5**

**From:** [Kevin Closs](#)  
**To:** [Yeung, Christopher](#); [Sylvia Woodmansee](#)  
**Cc:** [Nelson, Christine A](#); [Faith Gay](#); [Kevin Wallace](#); [Alex Finkelstein](#); [Saffarini, Serena](#); [Claire O'Brien](#); [Matthew Nussbaum](#); [Joshua Cockream](#)  
**Subject:** RE: Social Media MDL, N.D. Cal. No. 22-03047  
**Date:** Friday, April 4, 2025 6:10:54 PM  
**Attachments:** [OCFS - Meta April 4 Search Terms.xlsx](#)

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**[EXTERNAL]**

Chris,

Please see attached for updated hit reports for OCFS. We will review the documents hitting on these search terms as final.

Agency	Hits	Total With Families
OCFS	73,907	341,469

### Kevin Closs

Associate [\[Email\]](#)

Selendy Gay PLLC [\[Web\]](#)

Pronouns: he, him, his

-----  
+1 212.390.9082 [O]

+1 732.687.4547 [M]

---

**From:** Yeung, Christopher <cyeung@cov.com>  
**Sent:** Friday, April 4, 2025 1:32 PM  
**To:** Kevin Closs <kcloss@selendygay.com>; Sylvia Woodmansee <swoodmansee@selendygay.com>  
**Cc:** Nelson, Christine A <CNelson@cov.com>; Faith Gay <fgay@selendygay.com>; Kevin Wallace <Kevin.Wallace@ag.ny.gov>; Alex Finkelstein <Alex.Finkelstein@ag.ny.gov>; Saffarini, Serena <SSaffarini@cov.com>; Claire O'Brien <cobrien@selendygay.com>; Matthew Nussbaum <mnussbaum@selendygay.com>; Joshua Cockream <jcockream@selendygay.com>  
**Subject:** RE: Social Media MDL, N.D. Cal. No. 22-03047

Kevin,

Please see the attached proposed revision. We reserve all rights.

Best,

Chris

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**From:** Kevin Closs <[kcloss@selendygay.com](mailto:kcloss@selendygay.com)>

**Sent:** Friday, April 4, 2025 1:25 PM

**To:** Yeung, Christopher <[cyeung@cov.com](mailto:cyeung@cov.com)>; Sylvia Woodmansee <[swoodmansee@selendygay.com](mailto:swoodmansee@selendygay.com)>

**Cc:** Nelson, Christine A <[CNelson@cov.com](mailto:CNelson@cov.com)>; Faith Gay <[fgay@selendygay.com](mailto:fgay@selendygay.com)>; Kevin Wallace <[Kevin.Wallace@ag.ny.gov](mailto:Kevin.Wallace@ag.ny.gov)>; Alex Finkelstein <[Alex.Finkelstein@ag.ny.gov](mailto:Alex.Finkelstein@ag.ny.gov)>; Saffarini, Serena <[SSaffarini@cov.com](mailto:SSaffarini@cov.com)>; Claire O'Brien <[cobrien@selendygay.com](mailto:cobrien@selendygay.com)>; Matthew Nussbaum <[mnussbaum@selendygay.com](mailto:mnussbaum@selendygay.com)>; Joshua Cockream <[jcockream@selendygay.com](mailto:jcockream@selendygay.com)>

**Subject:** RE: Social Media MDL, N.D. Cal. No. 22-03047

**[EXTERNAL]**

Chris,

Please see the attached updated hit report for OCFS and let us know how Meta would like to revise.

Agency	Hits	Total With Families
OCFS	78,376	374,139

### Kevin Closs

Associate [\[Email\]](#)

Selendy Gay PLLC [\[Web\]](#)

Pronouns: he, him, his

+1 212.390.9082 [O]

+1 732.687.4547 [M]

---

**From:** Yeung, Christopher <[cyeung@cov.com](mailto:cyeung@cov.com)>

**Sent:** Thursday, April 3, 2025 10:31 PM

**To:** Kevin Closs <[kcloss@selendygay.com](mailto:kcloss@selendygay.com)>; Sylvia Woodmansee <[swoodmansee@selendygay.com](mailto:swoodmansee@selendygay.com)>

**Cc:** Nelson, Christine A <[CNelson@cov.com](mailto:CNelson@cov.com)>; Faith Gay <[fgay@selendygay.com](mailto:fgay@selendygay.com)>; Kevin Wallace <[Kevin.Wallace@ag.ny.gov](mailto:Kevin.Wallace@ag.ny.gov)>; Alex Finkelstein <[Alex.Finkelstein@ag.ny.gov](mailto:Alex.Finkelstein@ag.ny.gov)>; Saffarini, Serena <[SSaffarini@cov.com](mailto:SSaffarini@cov.com)>; Claire O'Brien <[cobrien@selendygay.com](mailto:cobrien@selendygay.com)>; Matthew Nussbaum <[mnussbaum@selendygay.com](mailto:mnussbaum@selendygay.com)>; Joshua Cockream <[jcockream@selendygay.com](mailto:jcockream@selendygay.com)>

**Subject:** RE: Social Media MDL, N.D. Cal. No. 22-03047

Thank you, Kevin. I attach proposed revisions. We reserve all rights.

Best,

Chris

---

**From:** Kevin Closs <[kcloss@selendygay.com](mailto:kcloss@selendygay.com)>

**Sent:** Thursday, April 3, 2025 10:08 PM

**To:** Yeung, Christopher <[cyeung@cov.com](mailto:cyeung@cov.com)>; Sylvia Woodmansee <[swoodmansee@selendygay.com](mailto:swoodmansee@selendygay.com)>  
**Cc:** Nelson, Christine A <[CNelson@cov.com](mailto:CNelson@cov.com)>; Faith Gay <[fgay@selendygay.com](mailto:fgay@selendygay.com)>; Kevin Wallace <[Kevin.Wallace@ag.ny.gov](mailto:Kevin.Wallace@ag.ny.gov)>; Alex Finkelstein <[Alex.Finkelstein@ag.ny.gov](mailto:Alex.Finkelstein@ag.ny.gov)>; Saffarini, Serena <[SSaffarini@cov.com](mailto:SSaffarini@cov.com)>; Claire O'Brien <[cobrien@selendygay.com](mailto:cobrien@selendygay.com)>; Matthew Nussbaum <[mnussbaum@selendygay.com](mailto:mnussbaum@selendygay.com)>; Joshua Cockream <[jcockream@selendygay.com](mailto:jcockream@selendygay.com)>  
**Subject:** RE: Social Media MDL, N.D. Cal. No. 22-03047

**[EXTERNAL]**

Chris,

Please see the attached updated hit report for OCFS and let us know how Meta would like to revise.

Agency	Hits	Total With Families
OCFS	82,913	388,532

### Kevin Closs

Associate [\[Email\]](#)

Selendy Gay PLLC [\[Web\]](#)

Pronouns: he, him, his

+1 212.390.9082 [O]

+1 732.687.4547 [M]

---

**From:** Yeung, Christopher <[cyeung@cov.com](mailto:cyeung@cov.com)>

**Sent:** Thursday, April 3, 2025 4:39 PM

**To:** Kevin Closs <[kcloss@selendygay.com](mailto:kcloss@selendygay.com)>; Sylvia Woodmansee <[swoodmansee@selendygay.com](mailto:swoodmansee@selendygay.com)>

**Cc:** Nelson, Christine A <[CNelson@cov.com](mailto:CNelson@cov.com)>; Faith Gay <[fgay@selendygay.com](mailto:fgay@selendygay.com)>; Kevin Wallace <[Kevin.Wallace@ag.ny.gov](mailto:Kevin.Wallace@ag.ny.gov)>; Alex Finkelstein <[Alex.Finkelstein@ag.ny.gov](mailto:Alex.Finkelstein@ag.ny.gov)>; Saffarini, Serena <[SSaffarini@cov.com](mailto:SSaffarini@cov.com)>; Claire O'Brien <[cobrien@selendygay.com](mailto:cobrien@selendygay.com)>; Matthew Nussbaum <[mnussbaum@selendygay.com](mailto:mnussbaum@selendygay.com)>; Joshua Cockream <[jcockream@selendygay.com](mailto:jcockream@selendygay.com)>

**Subject:** RE: Social Media MDL, N.D. Cal. No. 22-03047

Kevin,

Please see the attached proposed revisions. Meta reserves all rights.

Best,

Chris

---

**From:** Kevin Closs <[kcloss@selendygay.com](mailto:kcloss@selendygay.com)>

**Sent:** Thursday, April 3, 2025 3:44 PM

**To:** Yeung, Christopher <[cyeung@cov.com](mailto:cyeung@cov.com)>; Sylvia Woodmansee <[swoodmansee@selendygay.com](mailto:swoodmansee@selendygay.com)>

**Cc:** Nelson, Christine A <[CNelson@cov.com](mailto:CNelson@cov.com)>; Faith Gay <[fgay@selendygay.com](mailto:fgay@selendygay.com)>; Kevin Wallace <[Kevin.Wallace@ag.ny.gov](mailto:Kevin.Wallace@ag.ny.gov)>; Alex Finkelstein <[Alex.Finkelstein@ag.ny.gov](mailto:Alex.Finkelstein@ag.ny.gov)>; Saffarini, Serena <[SSaffarini@cov.com](mailto:SSaffarini@cov.com)>; Claire O'Brien <[cobrien@selendygay.com](mailto:cobrien@selendygay.com)>; Matthew Nussbaum <[mnussbaum@selendygay.com](mailto:mnussbaum@selendygay.com)>; Joshua Cockream <[jcockream@selendygay.com](mailto:jcockream@selendygay.com)>

**Subject:** RE: Social Media MDL, N.D. Cal. No. 22-03047

**[EXTERNAL]**

Chris,

Please see the attached updated hit report for OCFS and let us know how Meta would like to revise.

Agency	Hits	Total With Families
OCFS	89,678	414,925

### Kevin Closs

Associate [\[Email\]](#)

Selendy Gay PLLC [\[Web\]](#)

Pronouns: he, him, his

+1 212.390.9082 [O]

+1 732.687.4547 [M]

---

**From:** Yeung, Christopher <[cyeung@cov.com](mailto:cyeung@cov.com)>

**Sent:** Thursday, April 3, 2025 12:03 AM

**To:** Kevin Closs <[kcloss@selendygay.com](mailto:kcloss@selendygay.com)>; Sylvia Woodmansee <[swoodmansee@selendygay.com](mailto:swoodmansee@selendygay.com)>

**Cc:** Nelson, Christine A <[CNelson@cov.com](mailto:CNelson@cov.com)>; Faith Gay <[fgay@selendygay.com](mailto:fgay@selendygay.com)>; Kevin Wallace <[Kevin.Wallace@ag.ny.gov](mailto:Kevin.Wallace@ag.ny.gov)>; Alex Finkelstein <[Alex.Finkelstein@ag.ny.gov](mailto:Alex.Finkelstein@ag.ny.gov)>; Saffarini, Serena <[SSaffarini@cov.com](mailto:SSaffarini@cov.com)>; Claire O'Brien <[cobrien@selendygay.com](mailto:cobrien@selendygay.com)>; Matthew Nussbaum <[mnussbaum@selendygay.com](mailto:mnussbaum@selendygay.com)>; Joshua Cockream <[jcockream@selendygay.com](mailto:jcockream@selendygay.com)>

**Subject:** RE: Social Media MDL, N.D. Cal. No. 22-03047

Kevin,

Please see the attached proposed revisions. We reserve all rights.

Best,

Chris

---

**From:** Kevin Closs <[kcloss@selendygay.com](mailto:kcloss@selendygay.com)>

**Sent:** Wednesday, April 2, 2025 6:14 PM

**To:** Yeung, Christopher <[cyeung@cov.com](mailto:cyeung@cov.com)>; Sylvia Woodmansee <[swoodmansee@selendygay.com](mailto:swoodmansee@selendygay.com)>

**Cc:** Nelson, Christine A <[CNelson@cov.com](mailto:CNelson@cov.com)>; Faith Gay <[fgay@selendygay.com](mailto:fgay@selendygay.com)>; Kevin Wallace <[Kevin.Wallace@ag.ny.gov](mailto:Kevin.Wallace@ag.ny.gov)>; Alex Finkelstein <[Alex.Finkelstein@ag.ny.gov](mailto:Alex.Finkelstein@ag.ny.gov)>; Saffarini, Serena <[SSaffarini@cov.com](mailto:SSaffarini@cov.com)>; Claire O'Brien <[cobrien@selendygay.com](mailto:cobrien@selendygay.com)>; Matthew Nussbaum <[mnussbaum@selendygay.com](mailto:mnussbaum@selendygay.com)>; Joshua Cockream <[jcockream@selendygay.com](mailto:jcockream@selendygay.com)>

**Subject:** RE: Social Media MDL, N.D. Cal. No. 22-03047

**[EXTERNAL]**

Chris,

We re-ran the search for OCFS according to the below. Please see the attached updated hit report for OCFS and let us know how Meta would like to revise.

Agency	Hits	Total With Families
OCFS	91,207	419,207

### Kevin Closs

Associate [\[Email\]](#)

Selendy Gay PLLC [\[Web\]](#)

Pronouns: he, him, his

+1 212.390.9082 [O]

+1 732.687.4547 [M]

---

**From:** Yeung, Christopher <[cyeung@cov.com](mailto:cyeung@cov.com)>

**Sent:** Wednesday, April 2, 2025 9:52 AM

**To:** Sylvia Woodmansee <[swoodmansee@selendygay.com](mailto:swoodmansee@selendygay.com)>

**Cc:** Nelson, Christine A <[CNelson@cov.com](mailto:CNelson@cov.com)>; Faith Gay <[fgay@selendygay.com](mailto:fgay@selendygay.com)>; Kevin Wallace <[Kevin.Wallace@ag.ny.gov](mailto:Kevin.Wallace@ag.ny.gov)>; Alex Finkelstein <[Alex.Finkelstein@ag.ny.gov](mailto:Alex.Finkelstein@ag.ny.gov)>; Saffarini, Serena <[SSaffarini@cov.com](mailto:SSaffarini@cov.com)>; Claire O'Brien <[cobrien@selendygay.com](mailto:cobrien@selendygay.com)>; Matthew Nussbaum <[mnussbaum@selendygay.com](mailto:mnussbaum@selendygay.com)>; Kevin Closs <[kcloss@selendygay.com](mailto:kcloss@selendygay.com)>; Joshua Cockream <[jcockream@selendygay.com](mailto:jcockream@selendygay.com)>

**Subject:** RE: Social Media MDL, N.D. Cal. No. 22-03047

Sylvia,

Please see the attached proposed revisions of OCFS. We noticed a few discrepancies with the last hit report:

1. The last hit report did not reflect the removal of "child" from one of the strings. We have

flagged that in the attached.

2. The hit report for string 14 does not appear to make sense. The “split” hit breakdowns for the string total 1,586, but the total hit listed for the search is 6,703. Can you please let check to see if there is an issue there?

We reserve all rights, including the right to propose additional terms in light of the fact that there appear to be errors in the last hit report.

Best,

Chris

---

**From:** Sylvia Woodmansee <[swoodmansee@selendygay.com](mailto:swoodmansee@selendygay.com)>

**Sent:** Monday, March 31, 2025 12:15 PM

**To:** Yeung, Christopher <[cyeung@cov.com](mailto:cyeung@cov.com)>

**Cc:** Nelson, Christine A <[CNelson@cov.com](mailto:CNelson@cov.com)>; Faith Gay <[fgay@selendygay.com](mailto:fgay@selendygay.com)>; Kevin Wallace <[Kevin.Wallace@ag.ny.gov](mailto:Kevin.Wallace@ag.ny.gov)>; Alex Finkelstein <[Alex.Finkelstein@ag.ny.gov](mailto:Alex.Finkelstein@ag.ny.gov)>; Saffarini, Serena <[SSaffarini@cov.com](mailto:SSaffarini@cov.com)>; Claire O'Brien <[cobrien@selendygay.com](mailto:cobrien@selendygay.com)>; Matthew Nussbaum <[mnussbaum@selendygay.com](mailto:mnussbaum@selendygay.com)>; Kevin Closs <[kcloss@selendygay.com](mailto:kcloss@selendygay.com)>; Joshua Cockream <[jcockream@selendygay.com](mailto:jcockream@selendygay.com)>

**Subject:** RE: Social Media MDL, N.D. Cal. No. 22-03047

**[EXTERNAL]**

Thanks, Chris.

Please see attached for updated hit reports for OCFS and OMH. Below is a summary of the updated hit counts. We will review the documents hitting on these OMH search terms as final. Please let us know how Meta would like to revise for OCFS.

Agency	Hits	Total With Families
OCFS	105,091	531,061
OMH	78,372	259,932

We reserve all rights.

Thank you,

Sylvia

**Sylvia Woodmansee**

Associate [\[Email\]](#)

Selendy Gay PLLC [\[Web\]](#)

Pronouns: she, her, hers

+1 212.390.9321 [O]

+1 802.829.0023 [M]

---

**From:** Yeung, Christopher <[cyeung@cov.com](mailto:cyeung@cov.com)>

**Sent:** Friday, March 28, 2025 10:29 PM

**To:** Sylvia Woodmansee <[swoodmansee@selendygay.com](mailto:swoodmansee@selendygay.com)>

**Cc:** Nelson, Christine A <[CNelson@cov.com](mailto:CNelson@cov.com)>; Faith Gay <[fgay@selendygay.com](mailto:fgay@selendygay.com)>; Kevin Wallace <[Kevin.Wallace@ag.ny.gov](mailto:Kevin.Wallace@ag.ny.gov)>; Alex Finkelstein <[Alex.Finkelstein@ag.ny.gov](mailto:Alex.Finkelstein@ag.ny.gov)>; Saffarini, Serena <[SSaffarini@cov.com](mailto:SSaffarini@cov.com)>; Claire O'Brien <[cobrien@selendygay.com](mailto:cobrien@selendygay.com)>; Matthew Nussbaum <[mnussbaum@selendygay.com](mailto:mnussbaum@selendygay.com)>; Kevin Closs <[kcloss@selendygay.com](mailto:kcloss@selendygay.com)>; Joshua Cockream <[jcockream@selendygay.com](mailto:jcockream@selendygay.com)>

**Subject:** RE: Social Media MDL, N.D. Cal. No. 22-03047

Sylvia,

Thank you. Please see the attached proposed revisions. We reserve all rights.

Best,

Chris

---

**From:** Sylvia Woodmansee <[swoodmansee@selendygay.com](mailto:swoodmansee@selendygay.com)>

**Sent:** Friday, March 28, 2025 9:27 AM

**To:** Yeung, Christopher <[cyeung@cov.com](mailto:cyeung@cov.com)>

**Cc:** Nelson, Christine A <[CNelson@cov.com](mailto:CNelson@cov.com)>; Faith Gay <[fgay@selendygay.com](mailto:fgay@selendygay.com)>; Kevin Wallace <[Kevin.Wallace@ag.ny.gov](mailto:Kevin.Wallace@ag.ny.gov)>; Alex Finkelstein <[Alex.Finkelstein@ag.ny.gov](mailto:Alex.Finkelstein@ag.ny.gov)>; Saffarini, Serena <[SSaffarini@cov.com](mailto:SSaffarini@cov.com)>; Claire O'Brien <[cobrien@selendygay.com](mailto:cobrien@selendygay.com)>; Matthew Nussbaum <[mnussbaum@selendygay.com](mailto:mnussbaum@selendygay.com)>; Kevin Closs <[kcloss@selendygay.com](mailto:kcloss@selendygay.com)>; Joshua Cockream <[jcockream@selendygay.com](mailto:jcockream@selendygay.com)>

**Subject:** RE: Social Media MDL, N.D. Cal. No. 22-03047

**[EXTERNAL]**

Thanks, Chris.

Please see attached for updated hit reports for OCFS and OMH. Below is a summary of the updated hit counts. Please let us know how Meta would like to revise.

Agency	Hits	Total With Families
OCFS	119,509	590,595
OMH	114,198	365,652



We reserve all rights.

Thank you,

Sylvia

**Sylvia Woodmansee**

Associate [Email]

Selendy Gay PLLC [Web]

Pronouns: she, her, hers

+1 212.390.9321 [O]

+1 802.829.0023 [M]

---

**From:** Yeung, Christopher <[cyeung@cov.com](mailto:cyeung@cov.com)>

**Sent:** Thursday, March 27, 2025 9:34 AM

**To:** Matthew Nussbaum <[mnussbaum@selendygay.com](mailto:mnussbaum@selendygay.com)>; Kevin Closs <[kcloss@selendygay.com](mailto:kcloss@selendygay.com)>;  
Claire O'Brien <[cobrien@selendygay.com](mailto:cobrien@selendygay.com)>

**Cc:** Nelson, Christine A <[CNelson@cov.com](mailto:CNelson@cov.com)>; Sylvia Woodmansee  
<[swoodmansee@selendygay.com](mailto:swoodmansee@selendygay.com)>; Faith Gay <[fgay@selendygay.com](mailto:fgay@selendygay.com)>; Kevin Wallace  
<[Kevin.Wallace@ag.ny.gov](mailto:Kevin.Wallace@ag.ny.gov)>; Alex Finkelstein <[Alex.Finkelstein@ag.ny.gov](mailto:Alex.Finkelstein@ag.ny.gov)>; Saffarini, Serena  
<[ssaffarini@cov.com](mailto:ssaffarini@cov.com)>; Joshua Cockream <[jcockream@selendygay.com](mailto:jcockream@selendygay.com)>; Audrey Regan  
<[aregan@selendygay.com](mailto:aregan@selendygay.com)>

**Subject:** RE: Social Media MDL, N.D. Cal. No. 22-03047

Matt,

Please see the attached proposed revisions. We reserve all rights.

Best,

Chris

---

**From:** Matthew Nussbaum <[mnussbaum@selendygay.com](mailto:mnussbaum@selendygay.com)>

**Sent:** Wednesday, March 26, 2025 1:03 PM

**To:** Yeung, Christopher <[cyeung@cov.com](mailto:cyeung@cov.com)>; Kevin Closs <[kcloss@selendygay.com](mailto:kcloss@selendygay.com)>; Claire O'Brien  
<[cobrien@selendygay.com](mailto:cobrien@selendygay.com)>

**Cc:** Nelson, Christine A <[CNelson@cov.com](mailto:CNelson@cov.com)>; Sylvia Woodmansee  
<[swoodmansee@selendygay.com](mailto:swoodmansee@selendygay.com)>; Faith Gay <[fgay@selendygay.com](mailto:fgay@selendygay.com)>; Kevin Wallace  
<[Kevin.Wallace@ag.ny.gov](mailto:Kevin.Wallace@ag.ny.gov)>; Alex Finkelstein <[Alex.Finkelstein@ag.ny.gov](mailto:Alex.Finkelstein@ag.ny.gov)>; Saffarini, Serena  
<[ssaffarini@cov.com](mailto:ssaffarini@cov.com)>; Joshua Cockream <[jcockream@selendygay.com](mailto:jcockream@selendygay.com)>; Audrey Regan  
<[aregan@selendygay.com](mailto:aregan@selendygay.com)>

**Subject:** RE: Social Media MDL, N.D. Cal. No. 22-03047

**[EXTERNAL]**

Thanks, Chris.

Please see attached for updated hit reports for OCFS and OMH. Below is a summary of the updated hit counts. Please let us know how Meta would like to revise.

Agency	Hits	Total With Families
OCFS	210,831	849,104
OMH	124,664	398,589

We reserve all rights.

Thank you,

Matt

**Matthew Nussbaum**

Associate [\[Email\]](#)

Selendy Gay PLLC [\[Web\]](#)

Pronouns: he, him, his

+1 212.390.9062 [O]

+1 856.534.8606 [M]

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**From:** Yeung, Christopher <[cyeung@cov.com](mailto:cyeung@cov.com)>

**Sent:** Monday, March 24, 2025 9:58 PM

**To:** Matthew Nussbaum <[mnussbaum@selendygay.com](mailto:mnussbaum@selendygay.com)>; Kevin Closs <[kcloss@selendygay.com](mailto:kcloss@selendygay.com)>; Claire O'Brien <[cobrien@selendygay.com](mailto:cobrien@selendygay.com)>

**Cc:** Nelson, Christine A <[CNelson@cov.com](mailto:CNelson@cov.com)>; Sylvia Woodmansee <[swoodmansee@selendygay.com](mailto:swoodmansee@selendygay.com)>; Faith Gay <[fgay@selendygay.com](mailto:fgay@selendygay.com)>; Kevin Wallace <[Kevin.Wallace@ag.ny.gov](mailto:Kevin.Wallace@ag.ny.gov)>; Alex Finkelstein <[Alex.Finkelstein@ag.ny.gov](mailto:Alex.Finkelstein@ag.ny.gov)>; Saffarini, Serena <[ssaffarini@cov.com](mailto:ssaffarini@cov.com)>; Audrey Regan <[aregan@selendygay.com](mailto:aregan@selendygay.com)>

**Subject:** RE: Social Media MDL, N.D. Cal. No. 22-03047

Matt,

Please see the attached proposed revisions. So that the record is clear, the OCFS hit reports below reflect the proposal that we made on 3/17 (and not 3/20). Meta reserves all rights.

Best,

Chris

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**From:** Matthew Nussbaum <[mnussbaum@selendygay.com](mailto:mnussbaum@selendygay.com)>  
**Sent:** Monday, March 24, 2025 12:46 PM  
**To:** Yeung, Christopher <[cyeung@cov.com](mailto:cyeung@cov.com)>; Kevin Closs <[kcloss@selendygay.com](mailto:kcloss@selendygay.com)>; Claire O'Brien <[cobrien@selendygay.com](mailto:cobrien@selendygay.com)>  
**Cc:** Nelson, Christine A <[CNelson@cov.com](mailto:CNelson@cov.com)>; Sylvia Woodmansee <[swoodmansee@selendygay.com](mailto:swoodmansee@selendygay.com)>; Faith Gay <[fgay@selendygay.com](mailto:fgay@selendygay.com)>; Kevin Wallace <[Kevin.Wallace@ag.ny.gov](mailto:Kevin.Wallace@ag.ny.gov)>; Alex Finkelstein <[Alex.Finkelstein@ag.ny.gov](mailto:Alex.Finkelstein@ag.ny.gov)>; Saffarini, Serena <[ssaffarini@cov.com](mailto:ssaffarini@cov.com)>; Audrey Regan <[aregan@selendygay.com](mailto:aregan@selendygay.com)>  
**Subject:** RE: Social Media MDL, N.D. Cal. No. 22-03047

**[EXTERNAL]**

Thanks, Chris.

Please see attached for updated hit reports for OCFS and OMH. Below is a summary of the updated hit counts. Please let us know how Meta would like to revise.

Agency	Hits	Total With Families
OCFS	230,871	904,060
OMH	144,080	483,569

We reserve all rights.

Thank you,

Matt

**Matthew Nussbaum**

Associate [\[Email\]](#)

Selendy Gay PLLC [\[Web\]](#)

Pronouns: he, him, his

+1 212.390.9062 [O]

+1 856.534.8606 [M]

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**From:** Yeung, Christopher <[cyeung@cov.com](mailto:cyeung@cov.com)>  
**Sent:** Thursday, March 20, 2025 12:44 AM  
**To:** Kevin Closs <[kcloss@selendygay.com](mailto:kcloss@selendygay.com)>; Claire O'Brien <[cobrien@selendygay.com](mailto:cobrien@selendygay.com)>  
**Cc:** Matthew Nussbaum <[mnussbaum@selendygay.com](mailto:mnussbaum@selendygay.com)>; Nelson, Christine A <[CNelson@cov.com](mailto:CNelson@cov.com)>; Sylvia Woodmansee <[swoodmansee@selendygay.com](mailto:swoodmansee@selendygay.com)>; Faith Gay <[fgay@selendygay.com](mailto:fgay@selendygay.com)>; Kevin

Wallace <[Kevin.Wallace@ag.ny.gov](mailto:Kevin.Wallace@ag.ny.gov)>; Alex Finkelstein <[Alex.Finkelstein@ag.ny.gov](mailto:Alex.Finkelstein@ag.ny.gov)>; Saffarini, Serena <[SSaffarini@cov.com](mailto:SSaffarini@cov.com)>

**Subject:** RE: Social Media MDL, N.D. Cal. No. 22-03047

Thank you, Kevin. I attach revised terms for OMH. For OCFS, it appears that you did not delete “childrens” and “children’s” from various strings as we proposed on March 17. Can you please re-run the hit report with that correction?

---

**From:** Kevin Closs <[kcloss@selendygay.com](mailto:kcloss@selendygay.com)>

**Sent:** Tuesday, March 18, 2025 1:33 PM

**To:** Yeung, Christopher <[cyeung@cov.com](mailto:cyeung@cov.com)>; Claire O'Brien <[cobrien@selendygay.com](mailto:cobrien@selendygay.com)>

**Cc:** Matthew Nussbaum <[mnussbaum@selendygay.com](mailto:mnussbaum@selendygay.com)>; Nelson, Christine A <[CNelson@cov.com](mailto:CNelson@cov.com)>; Sylvia Woodmansee <[swoodmansee@selendygay.com](mailto:swoodmansee@selendygay.com)>; Faith Gay <[fgay@selendygay.com](mailto:fgay@selendygay.com)>; Kevin Wallace <[Kevin.Wallace@ag.ny.gov](mailto:Kevin.Wallace@ag.ny.gov)>; Alex Finkelstein <[Alex.Finkelstein@ag.ny.gov](mailto:Alex.Finkelstein@ag.ny.gov)>; Saffarini, Serena <[SSaffarini@cov.com](mailto:SSaffarini@cov.com)>

**Subject:** RE: Social Media MDL, N.D. Cal. No. 22-03047

**[EXTERNAL]**

Chris,

Please see attached for updated hit reports for OMH and OCFS. Below is a summary of the updated hit counts. Please let us know how Meta would like to revise.

Agency	Hits	Total With Families
OCFS	284,856	1,014,190
OMH	144,114	483,606

We reserve all rights.

**Kevin Closs**

Associate [\[Email\]](#)

Selendy Gay PLLC [\[Web\]](#)

Pronouns: he, him, his

-----  
+1 212.390.9082 [O]

+1 732.687.4547 [M]

---

**From:** Yeung, Christopher <[cyeung@cov.com](mailto:cyeung@cov.com)>

**Sent:** Monday, March 17, 2025 7:26 PM

**To:** Kevin Closs <[kcloss@selendygay.com](mailto:kcloss@selendygay.com)>; Claire O'Brien <[cobrien@selendygay.com](mailto:cobrien@selendygay.com)>

**Cc:** Matthew Nussbaum <[mnussbaum@selendygay.com](mailto:mnussbaum@selendygay.com)>; Nelson, Christine A <[CNelson@cov.com](mailto:CNelson@cov.com)>; Sylvia Woodmansee <[swoodmansee@selendygay.com](mailto:swoodmansee@selendygay.com)>; Faith Gay <[fgay@selendygay.com](mailto:fgay@selendygay.com)>; Kevin

Wallace <[Kevin.Wallace@ag.ny.gov](mailto:Kevin.Wallace@ag.ny.gov)>; Alex Finkelstein <[Alex.Finkelstein@ag.ny.gov](mailto:Alex.Finkelstein@ag.ny.gov)>; Saffarini, Serena <[SSaffarini@cov.com](mailto:SSaffarini@cov.com)>

**Subject:** RE: Social Media MDL, N.D. Cal. No. 22-03047

Kevin,

Please see the attached proposed revisions. Meta reserves all rights.

Best,

Chris

---

**From:** Kevin Closs <[kcloss@selendygay.com](mailto:kcloss@selendygay.com)>

**Sent:** Friday, March 14, 2025 7:53 PM

**To:** Yeung, Christopher <[cyeung@cov.com](mailto:cyeung@cov.com)>; Claire O'Brien <[cobrien@selendygay.com](mailto:cobrien@selendygay.com)>

**Cc:** Matthew Nussbaum <[mnussbaum@selendygay.com](mailto:mnussbaum@selendygay.com)>; Nelson, Christine A <[CNelson@cov.com](mailto:CNelson@cov.com)>; Sylvia Woodmansee <[swoodmansee@selendygay.com](mailto:swoodmansee@selendygay.com)>; Faith Gay <[fgay@selendygay.com](mailto:fgay@selendygay.com)>; Kevin Wallace <[Kevin.Wallace@ag.ny.gov](mailto:Kevin.Wallace@ag.ny.gov)>; Alex Finkelstein <[Alex.Finkelstein@ag.ny.gov](mailto:Alex.Finkelstein@ag.ny.gov)>; Saffarini, Serena <[SSaffarini@cov.com](mailto:SSaffarini@cov.com)>

**Subject:** RE: Social Media MDL, N.D. Cal. No. 22-03047

**[EXTERNAL]**

Chris,

Please see attached for updated hit reports for OMH and OCFS. Below is a summary of the updated hit counts.

Agency	Hits	Total With Families
OCFS	521,276	1,431,411
OMH	175,619	565,101

Please let us know how Meta would like to revise.

We reserve all rights.

**Kevin Closs**

Associate [\[Email\]](#)

Selendy Gay PLLC [\[Web\]](#)

Pronouns: he, him, his

+1 212.390.9082 [O]

+1 732.687.4547 [M]

**From:** Yeung, Christopher <[cyeung@cov.com](mailto:cyeung@cov.com)>  
**Sent:** Thursday, March 13, 2025 6:24 PM  
**To:** Kevin Closs <[kcloss@selendygay.com](mailto:kcloss@selendygay.com)>; Claire O'Brien <[cobrien@selendygay.com](mailto:cobrien@selendygay.com)>  
**Cc:** Matthew Nussbaum <[mnussbaum@selendygay.com](mailto:mnussbaum@selendygay.com)>; Nelson, Christine A <[CNelson@cov.com](mailto:CNelson@cov.com)>; Sylvia Woodmansee <[swoodmansee@selendygay.com](mailto:swoodmansee@selendygay.com)>; Faith Gay <[fgay@selendygay.com](mailto:fgay@selendygay.com)>; Kevin Wallace <[Kevin.Wallace@ag.ny.gov](mailto:Kevin.Wallace@ag.ny.gov)>; Alex Finkelstein <[Alex.Finkelstein@ag.ny.gov](mailto:Alex.Finkelstein@ag.ny.gov)>; Saffarini, Serena <[SSaffarini@cov.com](mailto:SSaffarini@cov.com)>  
**Subject:** RE: Social Media MDL, N.D. Cal. No. 22-03047

Thank you, Kevin. Please see the attach revisions for OCFS and OMH.

**From:** Kevin Closs <[kcloss@selendygay.com](mailto:kcloss@selendygay.com)>  
**Sent:** Wednesday, March 12, 2025 10:03 AM  
**To:** Yeung, Christopher <[cyeung@cov.com](mailto:cyeung@cov.com)>; Claire O'Brien <[cobrien@selendygay.com](mailto:cobrien@selendygay.com)>  
**Cc:** Matthew Nussbaum <[mnussbaum@selendygay.com](mailto:mnussbaum@selendygay.com)>; Nelson, Christine A <[CNelson@cov.com](mailto:CNelson@cov.com)>; Sylvia Woodmansee <[swoodmansee@selendygay.com](mailto:swoodmansee@selendygay.com)>; Faith Gay <[fgay@selendygay.com](mailto:fgay@selendygay.com)>; Kevin Wallace <[Kevin.Wallace@ag.ny.gov](mailto:Kevin.Wallace@ag.ny.gov)>; Alex Finkelstein <[Alex.Finkelstein@ag.ny.gov](mailto:Alex.Finkelstein@ag.ny.gov)>; Saffarini, Serena <[SSaffarini@cov.com](mailto:SSaffarini@cov.com)>  
**Subject:** RE: Social Media MDL, N.D. Cal. No. 22-03047

**[EXTERNAL]**

Chris,

Please see attached for updated hit reports for OMH and OCFS. Please let us know how Meta would like to revise. Below is a summary of the updated hit counts.

Agency	Hits	Total With Families
OCFS	533,217	1,447,536
OMH	200,143	615,920

We reserve all rights.

**Kevin Closs**

Associate [\[Email\]](#)

Selendy Gay PLLC [\[Web\]](#)

Pronouns: he, him, his

+1 212.390.9082 [O]

+1 732.687.4547 [M]

**From:** Yeung, Christopher <[cyeung@cov.com](mailto:cyeung@cov.com)>

**Sent:** Monday, March 10, 2025 11:34 PM

**To:** Kevin Closs <[kcloss@selendygay.com](mailto:kcloss@selendygay.com)>; Claire O'Brien <[cobrien@selendygay.com](mailto:cobrien@selendygay.com)>

**Cc:** Matthew Nussbaum <[mnussbaum@selendygay.com](mailto:mnussbaum@selendygay.com)>; Nelson, Christine A <[CNelson@cov.com](mailto:CNelson@cov.com)>; Sylvia Woodmansee <[swoodmansee@selendygay.com](mailto:swoodmansee@selendygay.com)>; Faith Gay <[fgay@selendygay.com](mailto:fgay@selendygay.com)>; Kevin Wallace <[Kevin.Wallace@ag.ny.gov](mailto:Kevin.Wallace@ag.ny.gov)>; Alex Finkelstein <[Alex.Finkelstein@ag.ny.gov](mailto:Alex.Finkelstein@ag.ny.gov)>; Saffarini, Serena <[SSaffarini@cov.com](mailto:SSaffarini@cov.com)>

**Subject:** RE: Social Media MDL, N.D. Cal. No. 22-03047

Kevin,

Please see the attached proposed revised OMH and OCFS terms. Meta reserves all rights.

Best,

Chris

---

**From:** Kevin Closs <[kcloss@selendygay.com](mailto:kcloss@selendygay.com)>

**Sent:** Monday, March 10, 2025 4:46 PM

**To:** Yeung, Christopher <[cyeung@cov.com](mailto:cyeung@cov.com)>; Claire O'Brien <[cobrien@selendygay.com](mailto:cobrien@selendygay.com)>

**Cc:** Matthew Nussbaum <[mnussbaum@selendygay.com](mailto:mnussbaum@selendygay.com)>; Nelson, Christine A <[CNelson@cov.com](mailto:CNelson@cov.com)>; Sylvia Woodmansee <[swoodmansee@selendygay.com](mailto:swoodmansee@selendygay.com)>; Faith Gay <[fgay@selendygay.com](mailto:fgay@selendygay.com)>; Kevin Wallace <[Kevin.Wallace@ag.ny.gov](mailto:Kevin.Wallace@ag.ny.gov)>; Alex Finkelstein <[Alex.Finkelstein@ag.ny.gov](mailto:Alex.Finkelstein@ag.ny.gov)>; Saffarini, Serena <[SSaffarini@cov.com](mailto:SSaffarini@cov.com)>

**Subject:** RE: Social Media MDL, N.D. Cal. No. 22-03047

**[EXTERNAL]**

Thanks, Chris. Please see attached for the updated DOH hit report. With the revised Term #2, the DOH hit count is 91,523 with a total of 255,681 including families. We will now begin actively reviewing the DOH documents that hit on these final terms.

We look forward to receiving your proposed revisions to the OCFS and OMH terms.

**Kevin Closs**

Associate [\[Email\]](#)

Selendy Gay PLLC [\[Web\]](#)

Pronouns: he, him, his

+1 212.390.9082 [O]

+1 732.687.4547 [M]

---

**From:** Yeung, Christopher <[cyeung@cov.com](mailto:cyeung@cov.com)>

**Sent:** Monday, March 10, 2025 10:56 AM

**To:** Kevin Closs <[kcloss@selendygay.com](mailto:kcloss@selendygay.com)>; Claire O'Brien <[cobrien@selendygay.com](mailto:cobrien@selendygay.com)>

**Cc:** Matthew Nussbaum <[mnussbaum@selendygay.com](mailto:mnussbaum@selendygay.com)>; Nelson, Christine A <[CNelson@cov.com](mailto:CNelson@cov.com)>; Sylvia Woodmansee <[swoodmansee@selendygay.com](mailto:swoodmansee@selendygay.com)>; Faith Gay <[fgay@selendygay.com](mailto:fgay@selendygay.com)>; Kevin

Wallace <[Kevin.Wallace@ag.ny.gov](mailto:Kevin.Wallace@ag.ny.gov)>; Alex Finkelstein <[Alex.Finkelstein@ag.ny.gov](mailto:Alex.Finkelstein@ag.ny.gov)>; Saffarini, Serena <[SSaffarini@cov.com](mailto:SSaffarini@cov.com)>

**Subject:** RE: Social Media MDL, N.D. Cal. No. 22-03047

Thank you, Kevin. As reflected in the attached email memorializing our agreement, the hit targets reflect numbers that are “deduplicated across custodians within agencies and not including family members.” Accordingly, we are actually about 10K below the target already for DOH. As such, please increase the proximity limiter for search number 2 from 25 to 45. That should get us back to the hit target (or thereabouts). I attach a revised set of terms reflecting that single proposed edit.

We will be in touch with proposed revisions to the OCFS and OMH terms.

Best,

Chris

---

**From:** Kevin Closs <[kcloss@selendygay.com](mailto:kcloss@selendygay.com)>

**Sent:** Monday, March 10, 2025 10:36 AM

**To:** Claire O'Brien <[cobrien@selendygay.com](mailto:cobrien@selendygay.com)>; Yeung, Christopher <[cyeung@cov.com](mailto:cyeung@cov.com)>

**Cc:** Matthew Nussbaum <[mnussbaum@selendygay.com](mailto:mnussbaum@selendygay.com)>; Nelson, Christine A <[CNelson@cov.com](mailto:CNelson@cov.com)>; Sylvia Woodmansee <[swoodmansee@selendygay.com](mailto:swoodmansee@selendygay.com)>; Faith Gay <[fgay@selendygay.com](mailto:fgay@selendygay.com)>; Kevin Wallace <[Kevin.Wallace@ag.ny.gov](mailto:Kevin.Wallace@ag.ny.gov)>; Alex Finkelstein <[Alex.Finkelstein@ag.ny.gov](mailto:Alex.Finkelstein@ag.ny.gov)>; Saffarini, Serena <[SSaffarini@cov.com](mailto:SSaffarini@cov.com)>

**Subject:** RE: Social Media MDL, N.D. Cal. No. 22-03047

**[EXTERNAL]**

Chris,

Please see attached for hit reports for DOH, OMH and OCFS. For this OCFS report, the wildcard is removed from “child” per your Friday email. Thank you for pointing out the discrepancy.

Below is a summary of the updated hit counts. As you can see, the hit counts are still above the target levels of our January 16 agreement.

Agency	Hits	Total With Families
OCFS	753,725	1,809,052
DOH	86,667	247,117
OMH	272,723	797,900

We reserve all rights and maintain all objections.

**Kevin Closs**

Associate [\[Email\]](#)



Selendy Gay PLLC [[Web](#)]

Pronouns: he, him, his

+1 212.390.9082 [O]

+1 732.687.4547 [M]

---

**From:** Claire O'Brien <[cobrien@selendygay.com](mailto:cobrien@selendygay.com)>

**Sent:** Saturday, March 8, 2025 10:28 AM

**To:** Yeung, Christopher <[cyeung@cov.com](mailto:cyeung@cov.com)>

**Cc:** Matthew Nussbaum <[mnussbaum@selendygay.com](mailto:mnussbaum@selendygay.com)>; Nelson, Christine A <[CNelson@cov.com](mailto:CNelson@cov.com)>; Kevin Closs <[kcloss@selendygay.com](mailto:kcloss@selendygay.com)>; Sylvia Woodmansee <[swoodmansee@selendygay.com](mailto:swoodmansee@selendygay.com)>; Faith Gay <[fgay@selendygay.com](mailto:fgay@selendygay.com)>; Kevin Wallace <[Kevin.Wallace@ag.ny.gov](mailto:Kevin.Wallace@ag.ny.gov)>; Alex Finkelstein <[Alex.Finkelstein@ag.ny.gov](mailto:Alex.Finkelstein@ag.ny.gov)>; Saffarini, Serena <[SSaffarini@cov.com](mailto:SSaffarini@cov.com)>

**Subject:** Re: Social Media MDL, N.D. Cal. No. 22-03047

Chris,

Thanks for getting back promptly. If Meta prefers to proceed using the existing term format, then we will continue to run terms as sent. I just wanted to ensure you know that it takes us longer to return hit reports this way - and was simply suggesting a proposal that would let us run reports and finalize terms much quicker. We will revert with hit reports on the new terms as you sent as soon as possible as well as follow up on OCFS.

Thanks,

Claire

**Claire O'Brien**

Partner

Selendy Gay PLLC

-----  
+1 212.390.9315 [O]

+1 518.669.0970 [M]

---

**From:** Yeung, Christopher <[cyeung@cov.com](mailto:cyeung@cov.com)>

**Sent:** Saturday, March 8, 2025 10:20:59 AM

**To:** Claire O'Brien <[cobrien@selendygay.com](mailto:cobrien@selendygay.com)>

**Cc:** Matthew Nussbaum <[mnussbaum@selendygay.com](mailto:mnussbaum@selendygay.com)>; Nelson, Christine A <[CNelson@cov.com](mailto:CNelson@cov.com)>; Kevin Closs <[kcloss@selendygay.com](mailto:kcloss@selendygay.com)>; Sylvia Woodmansee <[swoodmansee@selendygay.com](mailto:swoodmansee@selendygay.com)>; Faith Gay <[fgay@selendygay.com](mailto:fgay@selendygay.com)>; Kevin Wallace <[Kevin.Wallace@ag.ny.gov](mailto:Kevin.Wallace@ag.ny.gov)>; Alex Finkelstein <[Alex.Finkelstein@ag.ny.gov](mailto:Alex.Finkelstein@ag.ny.gov)>; Saffarini, Serena <[SSaffarini@cov.com](mailto:SSaffarini@cov.com)>

**Subject:** Re: Social Media MDL, N.D. Cal. No. 22-03047

Claire,

We previously provided you with search terms in the same format that I sent you, and your team presumably already has converted those into a format that can be run on Relativity to provide your initial hit reports. The documents I sent show in tracked changes edits that we made to those already-provided sets of terms—e.g., the removal of certain words, and proximity limiter reductions. It should be relatively straightforward for your team to apply those changes to the terms that you have already, and run those terms in Relativity. Other states and agencies have not had an issue proceeding in this manner, even though they too were using Relativity and were subject to a 450-character limit for individual searches. If your team is having some unique difficulties with this process, please let me know when you are available to discuss with our technical personnel on the line, so that we can figure out a solution.

Best,

Chris

Sent from my iPhone

On Mar 8, 2025, at 7:08 AM, Claire O'Brien <[cobrien@selendygay.com](mailto:cobrien@selendygay.com)> wrote:

[EXTERNAL]

Chris, could you please confirm that these are under 450 characters? If not, would you please revise so that they can be run on Relativity? Much appreciated.

Claire O'Brien  
Partner  
Selendy Gay PLLC

-----  
+1 212.390.9315 [O]

+1 518.669.0970 [M]

---

From: Yeung, Christopher <[cyeung@cov.com](mailto:cyeung@cov.com)>

Sent: Friday, March 7, 2025 11:20:31 PM

To: Claire O'Brien <[cobrien@selendygay.com](mailto:cobrien@selendygay.com)>; Matthew Nussbaum  
<[mnussbaum@selendygay.com](mailto:mnussbaum@selendygay.com)>; Nelson, Christine A <[CNelson@cov.com](mailto:CNelson@cov.com)>

Cc: Kevin Closs <[kcloss@selendygay.com](mailto:kcloss@selendygay.com)>; Sylvia Woodmansee  
<[swoodmansee@selendygay.com](mailto:swoodmansee@selendygay.com)>; Faith Gay <[fgay@selendygay.com](mailto:fgay@selendygay.com)>; Wallace, Kevin  
<[kevin.wallace@ag.ny.gov](mailto:kevin.wallace@ag.ny.gov)>; Finkelstein, Alex <[Alex.Finkelstein@ag.ny.gov](mailto:Alex.Finkelstein@ag.ny.gov)>

Subject: RE: Social Media MDL, N.D. Cal. No. 22-03047

Claire,

While you check on the OCFS hit report, I attach proposed revisions to the OMH and DOH search terms.

Best,

Chris

From: Yeung, Christopher  
Sent: Friday, March 7, 2025 10:30 PM  
To: 'Claire O'Brien' <[cobrien@selendygay.com](mailto:cobrien@selendygay.com)>; Matthew Nussbaum <[mnussbaum@selendygay.com](mailto:mnussbaum@selendygay.com)>; Nelson, Christine A <[CNelson@cov.com](mailto:CNelson@cov.com)>  
Cc: Kevin Closs <[kcloss@selendygay.com](mailto:kcloss@selendygay.com)>; Sylvia Woodmansee <[swoodmansee@selendygay.com](mailto:swoodmansee@selendygay.com)>; Faith Gay <[fgay@selendygay.com](mailto:fgay@selendygay.com)>; Wallace, Kevin <[kevin.wallace@ag.ny.gov](mailto:kevin.wallace@ag.ny.gov)>; Finkelstein, Alex <[Alex.Finkelstein@ag.ny.gov](mailto:Alex.Finkelstein@ag.ny.gov)>  
Subject: RE: Social Media MDL, N.D. Cal. No. 22-03047

Claire,

Thank you. We will review. At first blush, there might be an error on the OCFS terms. On March 5, we proposed replacing child\* with child--in other words, removing the wildcard after the word child—for all OCFS searches. The hit report does not reflect that change. Can you please let me know if that was done?

To be clear, the edit above was intended only to apply to OCFS, and not to DOH or OMH.

Best,

Chris

From: Claire O'Brien <[cobrien@selendygay.com](mailto:cobrien@selendygay.com)<<mailto:cobrien@selendygay.com>>>  
Sent: Friday, March 7, 2025 7:35 PM  
To: Yeung, Christopher <[cyeung@cov.com](mailto:cyeung@cov.com)<<mailto:cyeung@cov.com>>>; Matthew Nussbaum <[mnussbaum@selendygay.com](mailto:mnussbaum@selendygay.com)<<mailto:mnussbaum@selendygay.com>>>; Nelson, Christine A <[CNelson@cov.com](mailto:CNelson@cov.com)<<mailto:CNelson@cov.com>>>  
Cc: Kevin Closs <[kcloss@selendygay.com](mailto:kcloss@selendygay.com)<<mailto:kcloss@selendygay.com>>>; Sylvia Woodmansee <[swoodmansee@selendygay.com](mailto:swoodmansee@selendygay.com)<<mailto:swoodmansee@selendygay.com>>>; Faith Gay <[fgay@selendygay.com](mailto:fgay@selendygay.com)<<mailto:fgay@selendygay.com>>>; Wallace, Kevin <[kevin.wallace@ag.ny.gov](mailto:kevin.wallace@ag.ny.gov)<<mailto:kevin.wallace@ag.ny.gov>>>; Finkelstein, Alex <[Alex.Finkelstein@ag.ny.gov](mailto:Alex.Finkelstein@ag.ny.gov)<<mailto:Alex.Finkelstein@ag.ny.gov>>>  
Subject: RE: Social Media MDL, N.D. Cal. No. 22-03047

[EXTERNAL]

Chris,

Please see attached for hit reports for OCFS, DOH, and OMH using Meta's March 5 search terms. As you can see, there is still a material difference between these hit counts and the target levels in our January 16 agreement.

We again ask that you propose terms using fewer than 450 characters each, so our litigation support team does not need to break them up before running the hit reports on Relativity, which would facilitate this process.

A summary of de-duplicated hits and family totals by agency is below.

Agency

Hits

Total With Families

OCFS

876,626

1,962,775

DOH

108,293

287,854

OMH

434,055

1,056,653

As previously noted, we are actively reviewing the documents at Chamber and CCF that hit on Meta's January 14 terms, as well as documents at OCFS, DOH, and OMH that hit on our December 20 terms.

We reserve all rights and maintain all objections.

Claire O'Brien

Partner [Email<<mailto:cobrien@selendygay.com>>]

Selendy Gay PLLC [Web<<https://www.selendygay.com/>>]

Pronouns: she, her, hers

-----

+1 212.390.9315 [O]

+1 518.669.0970 [M]

From: Yeung, Christopher <[cyeung@cov.com](mailto:cyeung@cov.com)<<mailto:cyeung@cov.com>>>

Sent: Wednesday, March 5, 2025 10:43 PM

To: Matthew Nussbaum

<[mnussbaum@selendygay.com](mailto:mnussbaum@selendygay.com)<<mailto:mnussbaum@selendygay.com>>>; Nelson, Christine A <[CNelson@cov.com](mailto:CNelson@cov.com)<<mailto:CNelson@cov.com>>>

Cc: Claire O'Brien <[cobrien@selendygay.com](mailto:cobrien@selendygay.com)<<mailto:cobrien@selendygay.com>>>; Kevin Closs <[kcloss@selendygay.com](mailto:kcloss@selendygay.com)<<mailto:kcloss@selendygay.com>>>; Sylvia Woodmansee <[swoodmansee@selendygay.com](mailto:swoodmansee@selendygay.com)<<mailto:swoodmansee@selendygay.com>>>; Audrey Regan <[aregan@selendygay.com](mailto:aregan@selendygay.com)<<mailto:aregan@selendygay.com>>>

Subject: RE: Social Media MDL, N.D. Cal. No. 22-03047

Matt,

Thank you. Please see revised terms for the remaining agencies: OMH, OCFS, and DOH. For ease of reference, the changes are reflected in redline to the proposal that we made on 1/14, so that you can see what edits to make to each string.

Please note that for OMH, we are proposing that the term “mental health” be dropped entirely. Similarly, for OCFS, we are proposing changing child\* to “child”. Your vendor should make those universal edits when running the searches for each of those agencies.

Please let us know if you have any questions.

Best,

Chris

From: Matthew Nussbaum

<[mnussbaum@selendygay.com](mailto:mnussbaum@selendygay.com)<<mailto:mnussbaum@selendygay.com>>>

Sent: Monday, March 3, 2025 10:13 PM

To: Yeung, Christopher <[cyeung@cov.com](mailto:cyeung@cov.com)<<mailto:cyeung@cov.com>>>; Nelson, Christine A <[CNelson@cov.com](mailto:CNelson@cov.com)<<mailto:CNelson@cov.com>>>

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Subject: Social Media MDL, N.D. Cal. No. 22-03047

[EXTERNAL]

Chris,

Attached, please find detailed hit reports for OCFS, DOH, OMH, and CCF using Meta’s January 14 terms. We ran the terms as provided, as well as using connectors of “w/100,” “w/75,” and “w/50” as requested. As we previously advised, because Relativity has a search term limit of 450 characters, we had to break up many of the terms to run them on the database. Let us know if you have any questions about the reports – we are glad to discuss if you see any issues.

Below, please find a summary by agency. As you know, the agreed upon hit target for DOH, OMH and CCF for 95,000; the target for OCFS was 75,000. All hit counts below are de-duplicated and include families.

Terms Connector

OCFS Hits

OCF Total w/ Families

DOH Hits

DOH Total w/ Families

OMH Hits

OMH Total w/ Families

CCF Hits

CCF Total w/ Families

As-is

885,306

1,963,961



134,124

351,748

1,309,405

2,154,369

44,635

69,168

w/100

885,306

1,963,961

134,124

351,748

1,309,405

2,154,369

43,738

67,988

w/75

870,277

1,950,373

131,004

338,809

1,304,866

2,147,687

42,631

66,767

w/50

837,106

1,908,125

128,585

334,577

1,296,701

2,137,500

40,849

64,510

We are actively reviewing the documents at CCF that hit on these using the as-is connectors, as those are within the target level of our January 16 agreement.

Please let us know how Meta would like to reduce the search terms at OCFS, DOH, and OMH. We ask that any proposal only include terms of less than 450 characters. In the meantime, as discussed, we are continuing to voluntarily review documents at these agencies that hit on our December 20 terms to ensure there is no delay while the search term process is finalized.

Finally, you asked whether certain errors identified in the Executive Chamber terms changed the hit counts. With those adjustments, the deduplicated total of individual documents is 6,931 and with families is 13,620.

We reserve all rights and are available to discuss.

Thank you,

Matt

Matthew Nussbaum

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Pronouns: he, him, his

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